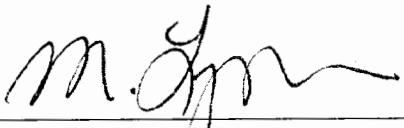


ORIGINAL

Approved: MAGGIE LYNAUGH
Assistant United States Attorney

DOC # _____

Before: HONORABLE BARBARA MOSES
United States Magistrate Judge
Southern District of New York-----X **22 MAG 6763**

UNITED STATES OF AMERICA

: SEALED COMPLAINT

:

: Violations of 18 U.S.C.

-v.-

: §§ 2252A(a)(5)(B),

: (a)(2)(B), (b)(1),

SHAWN STUCKER,

: (b)(2), and 2.

:

: COUNTY OF OFFENSE:

: MANHATTAN

Defendant.

:

-----X

SOUTHERN DISTRICT OF NEW YORK, ss.:

RICHARD STEPIEN, being duly sworn, deposes and says that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), and charges as follows:

COUNT ONE

(Possession of Child Pornography)

1. From at least in or about December 2019, up to and including in or about May 2022, in the Southern District of New York and elsewhere, SHAWN STUCKER, the defendant, knowingly possessed and accessed with intent to view, and attempted to possess and access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material that contained an image of child pornography that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, STUCKER possessed sexually explicit images of minors, including images of prepubescent minors who had

not attained 12 years of age, in his residence in New York, New York.

(Title 18, United States Code, Sections 2252A(a)(5)(B), (b)(2), and 2.)

COUNT TWO

(Distribution of Child Pornography)

2. From at least in or about December 2019, up to and including at least in or about May 2022, in the Southern District of New York and elsewhere, SHAWN STUCKER, the defendant, knowingly distributed and attempted to distribute material that contains child pornography that has been mailed, and using a means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, STUCKER distributed sexually explicit images of minors, including images of prepubescent minors who had not attained 12 years of age, over a social media platform.

(Title 18, United States Code, Sections 2252A(a)(2)(B), (b)(1) and 2.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

3. I am a Special Agent with HSI and have been so employed for approximately three years. I am assigned to an HSI squad charged with enforcing federal laws prohibiting child pornography and other forms of child exploitation. As such, I have worked on numerous investigations and prosecutions involving minor victims and the adults who victimize these children. This affidavit is based upon my personal participation in the investigation of this matter, as well as on my conversations with other law enforcement officers and my examination of documents, reports, and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts I have learned during the investigation. Where the contents of documents or the actions, statements, or conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

THE SOCIAL MEDIA POSTS

5. This investigation stems from reports made by a Canadian social media company known as AirG to the Royal Canadian Mounted

Police ("RCMP") regarding child pornography exchanged on AirG's platform. Based on those reports, and my own review of the subject messages, I know the following:

a. On January 2, 2020, AirG users "Sexy-Kimberly563" and "Emmaf4f" exchanged messages (the "Sexy-Kimberly563 Messages") about taking a "baby girl" home "to make her [their] living sex doll," a "5 year old little girl's pussy pic," and "eat[ing] [a baby girl's] little pussy." During the course of the conversation, Sexy-Kimberly563 shared eleven photos constituting child pornography with Emmaf4f. The children in the photos range in age from infant to approximately seven years old. Two of the photos show an erect penis entering the child's vagina or anus. One image depicts a dildo-type object inserted into an infant's vagina.

b. Subsequent to the exchange of the Sexy-Kimberly563 messages, AirG disabled the Sexy-Kimberly563 account. AirG continued, however, to identify and flag for law enforcement messages that appear to come from the user behind the Sexy-Kimberly563 account, based on the fact that the flagged messages send some of the same photographs shared with Emmaf4f by Sexy-Kimberly563, contain content similar to the communications between Sexy-Kimberly563 and Emmaf4f, and/or share some of the same images (e.g. profile pictures) as Sexy-Kimberly563.

c. For example, AirG identified the user behind the AirG account "Bad_sean" as likely being the same user behind Sexy-Kimberly563. The date of birth associated with the "Bad_sean" account matches the date of birth associated with the Sexy-Kimberly563 account, some of the profile and other images associated with the Bad_sean account match those associated with Sexy-Kimberly563, and Bad_sean has exchanged messages similar to those exchanged by Sexy-Kimberly563. Specifically, on November 7, 2021, Bad_sean exchanged the following messages with message with AirG user "Gothic_girl_82":

Bad_sean: I eat a 5months old little baby girl's pussy sexy

Gothic_girl_82: Need to watch you say

Bad_sean: Y

Gothic_girl_82: Don't want to get banned

d. AirG has identified numerous other accounts that appear to be associated with the Sexy-Kimberly563 account. Although there is no record that Bad_sean exchanged child pornography, other accounts identified by AirG as associated with Sexy-Kimberly563 did.

THE IDENTIFICATION OF THE ADDRESS ASSOCIATED WITH THE POSTS

6. Based on reports and records I have reviewed from AirG, I know that the Sexy-Kimberly563 Messages were sent using IP address 68.173.60.98 ("IP Address-1").

7. Based on reports and records I have reviewed from an internet service provider ("ISP-1"), I know that on the date Sexy-Kimberly563 sent child pornography to Emmaf4f, IP Address-1 was assigned to a subscriber (the "Subscriber") with a particular address in New York, New York ("Address-1").

8. Based on reports and records I have reviewed from the New York City Housing Authority ("NYCHA"), the landlord for Address-1, I know that SHAWN STUCKER, the defendant, was one of the individuals on record as residing at Address-1 at the time the Sexy-Kimberly563 Messages were sent.

9. Based on my review of law enforcement databases, I know that the date of birth associated with the Sexy-Kimberly563 account matches the date of birth of SHAWN STUCKER, the defendant.

THE SEARCH OF ADDRESS-1

10. Based on my participation in this investigation, I know that on or about May 26, 2022, law enforcement officers conducted a search of Address-1 pursuant to a lawfully issued search warrant. During that search, law enforcement officers seized several electronic devices, including a black TCL 20 XE cellphone ("Cellphone-1"), and several microSD cards (the "microSD Cards"). Cellphone-1 was located on the nightstand charging next to SHAWN STUCKER's, the defendant's, bed, and was identified by STUCKER as belonging to him. The microSD Cards were located in STUCKER's wallet, which he had on his person. STUCKER showed the cards to law enforcement officers during the search.

11. Based on my review of the contents of Cellphone-1, I know that Cellphone-1 contained nearly fifty unique child pornography images, including all eleven child pornographic images sent by Sexy-Kimberly563 to Emmaf4f on the AirG platform. Most of the child victims in the images appear to be under the age of eight. Cellphone-1 also contained two profile images used by Sexy-Kimberly563's AirG profile.

12. Based on my review of the contents of the microSD Cards, I know that the microSD Cards contained over thirty unique child pornography images, including all eleven child pornographic images

sent by Sexy-Kimberly563 to Emmaf4f. Most of the child victims in the images appear to be under the age of eight.

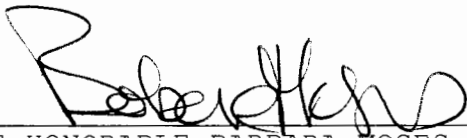
d. Based on an interview I conducted of SHAWN STUCKER, the defendant, during the course of the search of Address-1, I know that STUCKER stated, among other things, (i) that he had used the social medial platform AirG for approximately ten years, (ii) that he recalled using the AirG account Sexy-Kimberly563 a few years ago, and (iii) that many of his profiles had been banned from AirG. STUCKER also admitted that he often receives nude under-age photos on AirG, but claimed that he deletes the photos and doesn't send them to others.

WHEREFORE I respectfully request that a warrant be issued or the arrest of SHAWN STUCKER, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.



RICHARD STEPIEN
Special Agent
Homeland Security Investigations

Sworn to before me
this 17 day of August, 2022



THE HONORABLE BARBARA MOSES
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK